



Private School SNSP Registration Requirements

Welcome to the Wisconsin Department of Public Instruction's training module on the Special Needs Scholarship Program, or SNSP. The SNSP is governed by Wis. Stat. § 115.7915 and the Wis. Admin. Code ch. PI. 49. Provisions of this training module are subject to statutory and rule changes.

This training module will provide information on the SNSP private school registration requirements.

School Registration Requirements

Document Title	Due Date
Notice of Intent to Participate (ITP)	The first weekday in March prior to the school year (March 1, 2021)
Special Education Profile	The first weekday in March prior to the school year (March 1, 2021)
If the expected SNSP payments are \$50,000 or more: Budget & Cash Flow Report -OR- Surety Bond	Budget & Cash Flow Report= The first weekday in March prior to the school year (March 1, 2021) Surety Bond= The first weekday in June prior to the school year (June 1, 2021)
Accreditation Information -OR- SNSP Private School Requirements Form	Letter of Accreditation= August 1 SNSP Private School Requirements= The first weekday in March prior to the school year (March 1, 2021)
Certificate of Occupancy or Letter for all new schools and certain continuing schools	New Schools= The first weekday in May prior to the school year (May 3, 2021) Continuing Schools= Prior to the students being in the new location

Registration for the SNSP requires schools to submit the following documents:

- Notice of Intent to Participate, or ITP;
- Financial information or surety bond, if applicable;
- Special education profile;
- Accreditation information or SNSP Private School Requirements Form; and
- Certificate of occupancy or letter for all new schools and certain continuing schools.

Information about each of these requirements is provided later in this training module. The due dates of these required documents are also listed in the School Important Dates document on the SNSP School Information webpage. A link to the SNSP School Information webpage will be available at the end of this training.

Notice of Intent to Participate (ITP)

- Indicates the private school's intent to participate in the SNSP for the following school year.
- Electronically signed by the head of the governing board, or if designated by the head of the governing board, the SNSP administrator.
- Due annually by the first weekday in March (March 1, 2021)

Schools registering to participate in the SNSP must submit the Notice of Intent to Participate, or ITP, form annually by the first weekday in March. The ITP must be electronically signed and submitted by the head of the school's governing board.

ITP Submission

- The ITP submission link is available:
 - New Schools: On the SNSP Website
 - Continuing Schools: Emailed to the SNSP Administrator

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Schools that are new to the SNSP will access the ITP on the SNSP School Registration webpage.

Schools that participated in the SNSP during the prior school year are considered to be continuing SNSP schools. The link for the ITP will be individually emailed to the SNSP Administrator for each school. Continuing school ITPs will have prefilled information that the schools will need to review and modify as appropriate. If the change needs to also be made for the prior school year, a School Information Update form must be submitted as well. Continuing schools must use their unique ITP link rather than the new school ITP link because the continuing SNSP school ITP requires additional information.

For more information on the ITP, please see the SNSP Intent to Participate Form for New Schools or the SNSP Intent to Participate Form for Continuing Schools training modules. A link to the SNSP training modules can be found at the end of this training.

School Financial Information and Surety Bond

- If a private school reports in its ITP that it expects to receive \$50,000 or more in SNSP scholarships annually, then the private school must meet one of the following requirements:
 - Meet certain financial requirements or
 - Provide a surety bond.

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If a school indicates on its ITP that it expects to receive \$50,000 or more in SNSP scholarships annually, then the school must either meet certain financial requirements or provide a surety bond to the department. The ITP will identify the school's expected SNSP scholarship amount. The ITP will also identify if the school is required to meet one of these requirements.

Financial Requirements

- The school must not have any indicators that it will not be able to repay the full expected SNSP scholarship amount.
- The DPI will review the school's information to determine if the financial requirements are met. The requirements relate to:
 - A budget and cash flow report,
 - The school's financial audit, and
 - Timely paying of amounts owed.

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A school can choose to meet certain financial requirements when its ITP indicates that it expects to receive \$50,000 or more in SNSP scholarships during that school year.

The school must not have any indicators that it would not be able to repay the full expected SNSP scholarship amount. The indicators that DPI will review are related to 3 (three) areas. The first is the budget and cash flow report. The next is the school's financial audit. This is the financial audit that is due annually from the school by October 15th following each school year. The audit includes the financial information for the school year. Finally, the school must timely pay all employees, vendors, and government agencies.

If the school has any indicators that it will not be able to repay the full expected SNSP scholarship amount, the school will not meet the financial requirements. The school would instead be required to provide a surety bond. The department will notify the school whether or not it meets the financial requirements if a budget and cash flow report is submitted by the school.

SNSP School Budget & Cash Flow Report

- The budget and cash flow report is due annually by the first weekday in March (March 1, 2021).
- All activity and balances for the legal entity of the school **MUST** be included.
- Organizations are considered the same legal entity if:
 - The organizations have the same federal tax id number and use it for all activities including payroll.
 - The organizations are **NOT** separately set up with the Department of Financial Institutions.

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Schools that would like to meet the financial requirements must submit a budget and cash flow report and all required attachments by March 1. The budget and cash flow report that must be used is available on the School Registration webpage. A link to this webpage is available at the end of this training.

The budget and cash flow report must include the activity and balances for the legal entity of the school. Organizations are considered the same legal entity if they have the same federal tax id number and the organizations are not separately set up with the Department of Financial Institutions.

Budget & Cash Flow Report Indictors

- In order to meet the financial requirements, the budget and cash flow report may not have any of the following indicators when the SNSP expected payments are removed:
 - Insufficient revenues to fund operations
 - A negative cash balance in any month
 - Negative net asset balance
 - Current assets compared to current liabilities are negative
 - A net loss/negative change in net assets

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In order to meet the financial requirements, the budget and cash flow report may not have certain indicators when the SNSP expected payments are removed from the budget. These indicators are identified on the screen.

See the “Instructions (cont)” page in the budget and cash flow report for information on which lines must be reviewed to determine if the school meets the SNSP budget requirements. For example, the cash flow schedule identifies the cash balance without the SNSP revenue. The balance on this line must be positive every month for the school to meet the financial requirements.

Financial Audit Indicators

The school should review its last financial audit to determine if it had any of the following indicators. If so, the school will be required to use the surety bond option.

- Negative net asset balance.
- Current assets compared to current liabilities were negative.
- The Statement of Activities had a net loss/negative change in net assets.
- The financial audit opinion contained a qualification as to the school's ability to continue.

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The school's financial audit must also meet certain requirements. The school should first review the Statement of Financial Position in its financial audit to determine if it meets the first two requirements. Current assets, which include items such as cash and receivables, must be more than current liabilities, which include things such as accounts payable, payroll, and debt due within a year. Additionally, the net asset balance must be positive. The net asset balance is calculated as all of the assets less all of the liabilities on the Statement of Financial Position.

Additionally, the Statement of Activities cannot have a net loss/negative change in net assets. If this amount is negative, the school will not meet the SNSP financial requirements.

Finally, the school would not meet the SNSP financial requirements if the financial audit opinion had a qualification about the school's ability to continue.

Other Indicators

- The school failed to make payments to vendors as required per written agreement or, if there is no agreement, within 90 days of invoice or payment request.
- The school has past due amounts with government agencies, including payment of employee withholdings, even if the school has entered into a payment plan with the government agency.
- The school failed to pay employees as required by the Department of Workforce Development.

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Additional indicators that the school does not meet the financial requirements include:

- The school failed to make payments to vendors as required per written agreement or, if there is no agreement, within 90 days of invoice or payment request. This is an indicator even if there is a payment plan in place.
- The school has past due amounts with government agencies, including payment of employee withholdings, even if the school has entered into a payment plan with the government agency.
- The school failed to pay employees as required by the Department of Workforce Development.

In order to determine if the school has any of these indicators, the department will review the information submitted in the budget and cash flow report. Additionally, if the school is participating in the Choice program, the department will review the school's fiscal and internal control practices report to identify if any of these items occurred for the school.

Surety Bond

- Participating private schools can also opt to provide a surety bond rather than meet the financial requirements.
- May be required by the department if the department determines that the participating private school does not meet the program's financial requirements.
- The bond due annually by the first weekday in June (June 1, 2021) must be equal to 25% of the total amount of SNSP scholarships expected to be received based on the available scholarships in the ITP.

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Schools that expect to receive \$50,000 or more in SNSP scholarships can choose to provide a surety bond rather than meeting the financial requirements. A school may be required by the department to submit a surety bond if it is determined, after review of the school's financial information, that the school does not meet the SNSP's financial requirements.

The surety bond that is due annually by the first weekday in June (June 1, 2021) must be equal to 25% of the total amount of SNSP scholarships expected to be received by the school based on the available scholarships in the ITP.

Surety Bond (cont.)

- If the school's expected SNSP payments are \$50,000 or more and the school did not submit a budget and cash flow report by the first weekday in March (March 1, 2021), the DPI will email a surety bond form to the school with certain information prefilled.
- Any company that issues bonds may provide the bond. Schools can start by contacting their insurance agent to obtain the bond.
- **The school must use the 21-22 bond form emailed by the department. The insurance company cannot use their own form or update the 20-21 bond form to the 21-22 school year themselves.**

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By the middle of April, the DPI will send a surety bond form to the SNSP administrator for any school that did not submit a budget and cash flow report by the first weekday in March (March 1, 2021) and has expected SNSP payments of \$50,000 or more based on the ITP. The surety bond form will be partially filled in, including information such as the school name and the amount of the bond.

The surety bond may be provided by any company that issues bonds. A good place to start is to contact the school's insurance agent. Many insurance agents provide bonds. If your insurance agent does not provide bonds, they could refer you to someone who does provide bonds.

The school must use the 21-22 bond form emailed by the department. The insurance company cannot use their own form or update the 20-21 bond form to the 21-22 school year themselves.

Surety Bond (cont.)

STATE OF WISCONSIN
DEPARTMENT OF PUBLIC INSTRUCTION
SPECIAL NEEDS SCHOLARSHIP PROGRAM BOND

Whereas, _____ *(name of legal entity of school)*

- Legal Entity Name: This must be the legal entity name associated with the school's federal tax id number.

This screen shows the top section of the surety bond form. The legal entity name must be the name that coincides with the school's federal tax id number, or FEIN. If the school is a current participant in the Special Needs Scholarship Program or the Private School Choice Programs, the legal entity name will be filled in. Otherwise, the school will need to complete it themselves.

Surety Bond (cont.)

Signature Section of Surety Bond Form:

<hr/> <i>(Printed Name of Surety)</i>	<hr/> <i>(Signature of Authorized Individual for Principal)</i>
<hr/> <i>(Signature of Company Officer for Surety)</i>	<hr/> <i>(Printed Name of Authorized Individual for Principal)</i>
<hr/> <i>(Signature of Attorney-in-fact for Surety)</i>	<hr/> <i>(Printed Title of Authorized Individual for Principal)</i>
<p>These must be the signatures of individuals from the company providing the bond. Both signatures are not required.</p>	<p>This must be completed by an authorized individual from the school, such as the SNSP administrator or the head of the governing board.</p>

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The surety bond will refer to the provider of the bond as the “surety”. The “Printed Name of Surety” in the first column of the signature section must have the name of the company providing the bond. Some organizations will have both a company officer and an attorney-in-fact sign the form. Other organizations will have one or the other. At least one of these individuals must have signed the form for it to be valid. A Power of Attorney document must also be provided with the bond authorizing the individual from the surety company to sign the bond.

The surety bond will refer to the school as the “principal.” The authorized individual for the principal must be an individual from the school who is authorized to sign the bond. This is typically the school’s SNSP administrator or the school’s head of the governing board. This individual must complete all three lines in the second column of the bond form signature section.

The bond form may be signed using DocuSign. If the form is signed using DocuSign, the DocuSign Certificate of Completion should be provided with the bond.

Surety Bond (cont.)

- The department may call upon a bond for the following reasons:
 - The school failed to timely file the financial audit or the required enrollment reports;
 - The school failed to timely refund the department any certified amount due; or
 - The school failed to timely refund the department its reserve balance if it ceases to participate in the SNSP or is barred by the state superintendent from participation.

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There are several reasons why the department may call upon a surety bond. Those reasons are as follows:

- The school failed to timely file the financial audit or the required enrollment reports;
- The school failed to timely refund the department any certified amount due; or
- The school failed to timely refund the department its reserve balance if it ceases to participate in the SNSP or is barred by the state superintendent from participation.

Special Education Profile

Schools must provide their special education profile along with the ITP annually by the first weekday in March (March 1, 2021).

- New SNSP Schools: Complete the Google Form available on the SNSP website.
- Continuing SNSP schools: Schools must notify the department if the prior year profile should be used or provide changes to the profile annually by the first weekday in March (March 1, 2021).

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Schools must also provide their special education profile along with their ITP. The special education profile must be completed and submitted by the SNSP administrator.

Schools that are new to the SNSP must complete the special education profile using the link available on the School Registration page. A link to this webpage is available at the end of this training.

The SNSP Administrator for schools that are continuing in the SNSP receive a Google form where they must indicate whether the prior year profile should be used for the next school year or if the school would like to change the profile. If the SNSP Administrator indicates that the school would like to make changes, a copy of the special education profile will be emailed, and the SNSP administrator must make any necessary changes to the profile and email it back to the department by the first weekday in March.

Special Education Profile (cont.)

- The profile must describe the methods of instruction that will be used by the participating private school to provide special education and related services to the child.
- As a reminder, SNSP schools are required to implement the IEP or services plan of SNSP students, as modified by agreement between the SNSP school and the student's parent/guardian.

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The special education profile must include 2 items. The first item it must include is a description of the methods of instruction that will be used by the participating private school to provide special education and related services to the child. The methods of instruction should be sufficient for an applicant to understand the school's methods of instruction for its special education program. Schools should consider providing examples of some of the methods of instruction that will be used for SNSP pupils.

Schools participating in the SNSP are required to implement the student's Individualized Education Program (IEP) or services plan and related services, as modified by agreement of the school and the parent/guardian. If the school refers to the IEP or services plan in the special education profile, it must include a reference to both an IEP and a services plan since students participating in the SNSP may have either of these.

If the school uses a name for its agreement of services that it will be providing, the school should use terminology that makes it clear that the school is referring to the plan developed by the school rather than the IEP or services plan developed by the public school district.

Special Education Profile (cont.)

- The profile must describe the qualifications of the teachers and other persons who will be providing special education and related services to the child.
- The description should include the degrees, licenses, and certifications for teachers and other persons at the school who are providing special education and related services to SNSP students.

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The special education profile must also include a description of the qualifications of the teachers and other persons who will be providing special education and related services to the child. In this section, the school should describe the degrees, licenses, and certifications held by teachers and other persons at the school who will be providing special education and related services to SNSP students. This can identify the degrees, licenses, or certifications held for particular individuals at the school and/or can explain the qualifications held by staff at the school in general. This description does not need to identify the names of the particular teachers/staff at the school who will be working with the SNSP students.

Special Education Profile (cont.)

- The department posts a copy of all special education profiles to the SNSP website.
- All schools must provide a copy of the special education profile to each SNSP applicant.

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Submitted special education profiles are posted on the SNSP website. Schools are required to provide a copy of their special education profile to each student applicant. The department's electronic posting does not fulfill a school's responsibility to provide its special education profile to all of its SNSP applicants.

Accreditation/Private School Approval Requirement

- All SNSP schools must be:
 - Accredited by an accreditation agency;
 - OR-
 - Approved as a private school by the state superintendent.

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All schools participating in the SNSP must be:

- Accredited by a statutorily approved accreditation agency; or
- Approved as a private school by the state superintendent.

Accreditation Notification

- Submitted annually by August 1.
- The notification must be dated between July 1 and August 1 of that school year.
- The accreditation must include all of the grades that the SNSP school indicated on the ITP, or School Information Update Form, as available for SNSP students.
- A bulletin discussing the accreditation notification requirements and statutorily approved accreditation agencies is available on the SNSP Bulletins webpage.

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The accreditation notice, from the accreditation agency, must be submitted by August 1 annually and may not be dated any earlier than July 1 of that school year. If the school is also participating in the Private School Choice Programs, one notice is submitted to the Department for the school.

The accreditation notification must indicate that the school is accredited for all of the grades that the school identified on the ITP, or a School Information Update Form, as available for SNSP students. A SNSP school cannot have SNSP students in grades that it is not accredited for.

There is a bulletin on the SNSP website that discusses the accreditation notification requirements and provides a list of and contact information for all of the statutorily approved accreditation agencies. A link to the SNSP Bulletins webpage can be accessed at the end of this training.

Private School Requirements Form

- This form is only required for schools that are not fully accredited for all SNSP available grades.
- Submitted annually by the first weekday in March (March 1, 2021).
- Must be on required form.
- Must include all required attachments.
- Must be used by schools who do not meet the accreditation requirements.

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The Private School Requirements form is only required for schools that are not fully accredited for all SNSP available grades. Schools that are fully accredited for all SNSP available grades instead provide the accreditation notification previously explained.

A school that is seeking approval as a private school by the state superintendent, in lieu of accreditation, must submit a Private School Requirements form for the following school year. This form is due annually by the first weekday in March. Through the Private School Requirements form, the school must demonstrate that it meets all of the requirements of Wis. Stat. § 118.165. In order for the form to be considered complete, the school must also attach and submit all required documents with the form.

The Private School Requirements form is located on the School Registration webpage. A link to the SNSP School Registration webpage is available at the end of this training.

Certificate of Occupancy or Letter

- Schools new to the SNSP must submit one of the following by the first weekday in May for each of the school's locations.
 - A certificate of occupancy from the municipality within which the private school is located.
 - A certificate of occupancy from a local or regional unit who has the authority to issue certificates of occupancy.
 - If the municipality does not issue certificates of occupancy, then submit a letter from the municipality explaining that.
- Temporary certificates of occupancy are not sufficient.
- Continuing SNSP schools with a new location must provide one of the items listed above before students are at the location.

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All new SNSP schools must submit a certificate of occupancy or letter to the department by first weekday in May for each location of the school.

The school must either provide a certificate of occupancy from the municipality in which the private school is located or from a local or regional unit. If the municipality or local/regional unit does not issue certificates of occupancy, then the school should submit a letter from the municipality explaining that the municipality does not issue certificates of occupancy. One of these items must be provided for all schools that are new to the SNSP, even if the school previously participated in the Choice program.

Temporary certificates of occupancy are not sufficient to meet this requirement.

Additionally, schools that are continuing in the SNSP who add a location are required to provide a certificate of occupancy or the required letter for the new location before the students are at the new location.

Quiz #1

Schools must provide their special education profile to:

- a. Only the parents who request it.
- b. The DPI only.
- c. The DPI and all of the school's SNSP student applicants.
- d. None of the above. The school's programs are described in the student handbook.

The correct answer is c. Schools must submit their special education profile to the DPI by the first weekday in March. Wisconsin law also requires that schools provide their special education profile to all SNSP student applicants who apply for the SNSP at their school.

Quiz #2

Which schools are required to submit a certificate of occupancy, or a letter that a certificate of occupancy is not issued by the municipality, to the DPI?

- a. Only schools participating in both the SNSP and Choice programs.
- b. All new SNSP schools as well as continuing SNSP schools who move to a new location or open a new facility.
- c. All SNSP schools must submit certificates of occupancy every year.
- d. Only SNSP schools that don't participate in the Choice programs.

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The correct answer is b. All new SNSP schools must submit a certificate of occupancy to the DPI by the first weekday in May prior it participates. A certificate of occupancy, or letter as explained earlier, must be provided for all locations of the school. In addition, if a current SNSP school moves to a new location or opens a new facility, then the school must provide a new certificate of occupancy or letter to the DPI, prior to the students being in the new location.

Schools must send the required documentation to SNSP@dpi.wi.gov, even if they also participate in the Choice program.

Quiz #3

True or False: Schools participating in the SNSP can be accredited by any accreditation agency in the country.

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This is a false statement. Schools participating in the SNSP must be accredited by one of the statutorily approved accreditation agencies. A list of the statutorily approved accreditation agencies can be found in the Accreditation Information Bulletin. A link to the SNSP Bulletins webpage can be accessed at the end of this training.

Quiz #4

What bond form can a school that is using the surety bond option use?

- a. A bond form provided by the insurance company providing the bond.
- b. The 21-22 SNSP bond form emailed by the department.
- c. The 20-21 SNSP bond form emailed by the department that is updated for the current school year.

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The correct answer is b. The school must use the 21-22 SNSP bond form emailed by the department. None of the prefilled information in the bond form should be changed. If the school provides the incorrect bond form or changes prefilled information on the bond form, the department will require that the insurance company reissue the bond. If the school or insurance company believe any of the information on the bond form should be changed, they must contact the department in advance. If the department determines the information should be updated, the department will provide an updated form that can be used.

Available Resources

- School Registration Page: <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/school-registration>
- SNSP Bulletins: <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/bulletins>
- School Submitted Reports Webpage: <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/school-reports>
- SNSP Training: <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/school-training>
- SNSP Statutes & Rules: <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/statutes>

This slide includes the webpages that were referenced during the training.

Questions

Email: snsp@dpi.wi.gov

Phone: 1-888-245-2732 ext. 4



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If you have any questions about the information discussed in this module please contact the SNSP team at snsp@dpi.wi.gov or call the toll-free number at 1-888-245-2732, extension 4